

The Honorable Robert J. Bryan

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

UGOCHUKWU GOODLUCK
NWAUZOR, FERNANDO AGUIRRE-
URBINA, individually and on behalf of all
those similarly situated,

Plaintiffs,

v.

THE GEO GROUP, INC., a Florida
corporation,

Defendant.

No. 17-cv-05769-RJB

DECLARATION OF JAMAL N.
WHITEHEAD IN SUPPORT OF
PLAINTIFFS' OPPOSITION TO
DEFENDANT'S MOTION TO
EXCLUDE EXPERT TESTIMONY
OF DR. JEFFREY MUNSON

I, JAMAL N. WHITEHEAD, declare as follows:

1. I am over the age of eighteen, competent to testify in this matter, and do so
based on personal knowledge.

2. Plaintiff's expert, Dr. Jeffrey Munson, has performed damages calculations in
wage and hour class actions based upon voluminous payroll, timekeeping, and similar data
produced by defendant employers; and performed damages calculations in approximately forty
different wage cases; and has testified at trial in wage cases at least five times in the last five
years.

CERTIFICATE OF SERVICE

I hereby certify that on January 13, 2020, I electronically filed the foregoing, together with its supporting pleadings and attachments thereto, with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

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DATED at Seattle, Washington this 13th day of January, 2020.

s/ Virginia Mendoza

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